



April 28, 2011

Mr. Terry Drochak
Cultural Resources Specialist - Archaeologist
WSDOT Environmental Services Office
PO Box 47332, Olympia, WA 98504-7332

RE: SR 9 Pilchuck Creek Bridge Replacement Project

Dear Mr. Drochak,

In your letter of April 8, 2011, WSDOT initiated formal Section 106 consultation with the Washington Trust for Historic Preservation regarding the Pilchuck Creek Bridge Replacement Project. Thank you for the opportunity to participate. The Washington Trust is an advocacy organization dedicated to preserving historic and cultural resources across the state.

As a consulting party, the Washington Trust has been asked to comment on four identified alternatives for this project, described in the above referenced letter. Of these four, we feel Alternative 4, to build a new structure at a different location and remove the old bridge, should not be under consideration. To date, no documentation has been presented that would warrant the removal of this National Register-eligible structure. While the bridge is considered functionally obsolete, this fact alone does not provide justification for removal. It has also been described as in need of seismic upgrades. There are indeed a multitude of historic structures around the state in need of seismic upgrades. Again, the fact that a structure does not meet current seismic standards is not cause for removal. For these reasons, the Washington Trust recommends that Alternative 4 be taken out of consideration.

The remaining alternatives, Alternative 1-3, do describe scenarios that could be considered suitable from a preservation standpoint. To be able to fully consider these alternatives, however, more information is required for each, including (but not limited to) the number of vehicle trips per day, the average wait time drivers experience daily given the single lane span, cost estimates associated with rehabilitation, cost estimates for realignment of SR9 and new construction, etc. Moreover, it seems that at least one additional alternative should be considered. To date, has WSDOT conducted an analysis of retaining the existing SR9 alignment, rehabilitating the existing historic bridge to be used for single direction traffic flow, and constructing a new bridge adjacent to the existing historic bridge to carry traffic flow in the opposite direction? If so, is there a reason this alternative has not been presented to consulting parties? If not, the Washington Trust recommends this alternative be considered.

In terms of other regulatory processes involved, it is our understanding that funds from the Federal Highway Administration (FHWA) are involved in this project. FHWA involvement necessitates conducting an impact analysis to historic resources as defined in Section 4(f) of the Transportation Act. Has a Section 4(f) analysis taken place? In addition, the cultural resources report identifies several residences within the project APE. None of the structures evaluated were found to be eligible for listing in the National Register. Has DAHP concurred with this finding? One residence, identified as the Pilchuck Tree Farm House, retains a significant degree of historic integrity and may be eligible, if not for National Register listing, certainly for listing in the Washington Heritage Register.

Moving forward, as a consulting party the Washington Trust expects to play a role in vetting the alternatives presented and developing additional alternatives; to be kept apprised of new project developments such as studies, analyses, or findings; to attend meetings and/or presentations for project updates; and be notified of the timeframe and schedule for project implementation. The Washington Trust fully understands WSDOT's role related to the Section 106 process and the expectation that the agency meaningfully engage with all stakeholders who, by invitation or request, serve as consulting parties. We look forward to being involved in this process, analyzing pros and cons different scenarios may hold, and working toward an alternative that does not have an adverse effect on historic resources.

Thank you for the opportunity to comment on this important matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Moore".

Chris Moore
Field Director

CC: Chris Jenkins, USACE
Scott Williams, WSDOT
Matthew Sterner, DAHP